

FILED

June 12, 2024

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: CR Deputy

DR:24-CR-01474-EG

UNITED STATES OF AMERICA

§

Cause No.

§

§

INDICTMENT

§

v.

§

[VIO: COUNT ONE: 18 U.S.C. §
922(g)(1) and 924(a)(8) - Felon in
Possession of a Firearm; COUNT TWO:
18 U.S.C. § 922(g)(1) and 924(a)(8) -
Felon in Possession of a Firearm.]

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§

MICHAEL LANE HAYES

§

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. § 922(g)(1) and 924(a)(8)]

On or about May 16, 2024, in the Western District of Texas, Defendant,

MICHAEL LANE HAYES,

knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit:, a Smith and Wesson, Model SD40 VE, .40 caliber pistol (S/N: FZS9228), said firearm having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT TWO

[18 U.S.C. § 922(g)(1) and 924(a)(8)]

On or about May 16, 2024, in the Western District of Texas, Defendant,

MICHAEL LANE HAYES,

knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit:, a Hatfield, Model SGL .410 bore shotgun (S/N: 410S17-005228, said firearm having been shipped and transported in foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

[See FED. R. CRIM. P. 32.2]

I.

Firearms Violation and Forfeiture Statutes

[Title 18 U.S.C. § 922(g)(1),

**subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1),
made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c).]**

As a result of the foregoing criminal violations set forth in Counts One and Two, the United States of America gives notice to the Defendant of its intent to seek the forfeiture of property, including any items listed below, upon conviction and as a part of sentence pursuant to FED. R. CRIM. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture pursuant to Title 28 U.S.C. § 2461(c), which states the following:

Title 18 U.S.C. § 924. Penalties

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (g) . . . of section 922, . . . shall be subject to seizure and forfeiture


This Notice of Demand for Forfeiture includes but is not limited to the following.

- 1. Smith & Wesson SD40 VE .40 caliber pistol, s/n FZS9228;**
- 2. Hatfield SGL .410 gauge shotgun, s/n 410S17-005228; and**
- 3. Any related ammunition and firearm accessories.**

A TRUE BILL.

FOREPERSON

JAIME ESPARZA
United States Attorney

By:  For
ZACHARY D. BIRD
Assistant United States Attorney